

## ***NAYDENSKIY LAW GROUP, P.C.***

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VIA ECF

January 10, 2018

**Honorable Judge Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY, 10007**

**Re: *Williams v. Sonin* 17-cv-3141 (PGG)**

**Dear Honorable Judge Gardephe:**

We represent the Plaintiff in this wage and hour action brought pursuant to 29 U.S.C. §206. Plaintiff's counsel opposes Defendants' request to move to dismiss the Complaint.

Defendants' letter request for a pre-motion conference to dismiss, based on the faulty argument that Plaintiff's claims are not subject to the FLSA, ignores 29 CFR 552.99. Wherein, 29 CFR 552.99 specifically states that "Congress in section 2(a) of the [Act](#) specifically found that the employment of [persons](#) in domestic service in households affects commerce.". Thus, Plaintiff has correctly pled her FLSA claims.

Therefore, for the reasons stated herein, Plaintiff respectfully requests Your Honor deny Defendant's request to file a motion to dismiss.

We thank the Court for its attention to this matter.

NAYDENSKIY LAW GROUP, P.C.

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s/  
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